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February 13, 2008

BY HAND

Honorable Deborah A. Batts
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Room 2510
New York, NY 10007

MEMO ENDORSED

Re: Simon Sidney Honig v. Michael Bloomberg, et al.
08-CV-00541 (DAB)

Your Honor:

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, supervising the defense of the above-referenced federal civil rights lawsuit.¹ I write on behalf of the Office of the Corporation Counsel, which currently represents Mayor Michael Bloomberg, to respectfully request that Your Honor endorse the proposed briefing schedule set forth below. Our office contacted plaintiff, who is proceeding *pro se*, and it is not clear at this time whether he consents to this request.

By way of background, plaintiff alleges in his complaint that Mayor Bloomberg and Attorney General Andrew Cuomo have refused to consider his complaints about alleged connections between the New York City Police Department and organized crime. Plaintiff further alleges that this refusal, coupled with alleged police involvement therein, has caused direct harm to plaintiff and plaintiff's son.

As plaintiff's complaint fails to state a claim, this office intends to file a motion to dismiss under Fed. R. Civ. P. 12(b)(6) in lieu of an answer. Accordingly, we propose that the motion on behalf of defendant Michael Bloomberg be filed no later than March 7, 2008, that plaintiff's opposition be filed no later than April 4, 2008, and that defendant Bloomberg's response be filed no later than April 18, 2008.

¹ This case has been assigned to Assistant Corporation Counsel Maurice Hudson, who is presently awaiting admission to the bar and is handling this matter under my supervision. Mr. Hudson may be reached directly at (212) 788-8684.

MEMO ENDORSED

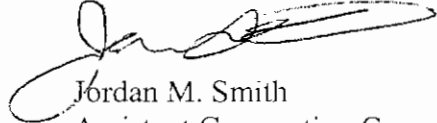
Denied
DAB

No previous request for an extension has been made by defendant Bloomberg and there are no scheduled conferences that will be affected by this proposed briefing schedule. Accordingly, it is respectfully requested that the Court endorse the briefing schedule proposed herein.

Thank you for your consideration of this request.

MEMO ENDORSED

Respectfully submitted,



Jordan M. Smith
Assistant Corporation Counsel

cc: Simon Sidney Honig (BY MAIL)
Plaintiff *Pro Se*
65-10 108th Street
Forest Hills, NY 11375

MEMO ENDORSED

cc: Julia H. Lee, Esq. (BY HAND)
Assistant Attorney General
Office of the Attorney General
120 Broadway
New York, NY 10271

SO ORDERED



DEBORAH A. BATTS
UNITED STATES DISTRICT JUDGE